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Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**NERINDA ROBINSON, individually,
Plaintiff,**

vs.

**GREAT CLIPS, INC., A Foreign
Corporation; BRANDEE CHAMBERS,
individually,
Defendants.**

Case No. 2:15-cv-1162-APG-VCF

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE MOTION TO DISMISS
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 6(b)(1)(A), Plaintiff respectfully requests that the Court extend by 7-days, or until October 2, 2015, the time within which Plaintiff must respond to the motion to dismiss filed by Defendant Brandee Chambers. Plaintiff's response is currently due on September 25, 2015. This is Plaintiff's first request for extension of time for the purpose set forth herein.

In support of this motion, Plaintiff relies upon the memorandum of points and authorities set forth below.

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MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1)(A) permits a party to extend a deadline prior to its expiration “for good cause.”

Here, good cause exists to extend the current deadline for responding to the pending dispositive motion. Undersigned counsel commenced drafting a response to the motion to dismiss but unfortunately has not been able to complete it within the current deadline. During the past three days, undersigned counsel was involved with the taking of several depositions and discovery related issues in another civil matter pending in Clark County District Court. Undersigned counsel’s competing case commitments prevented him from devoting sufficient time to the completion of a response. A short one week extension, however, will provide reasonable time for Plaintiff’s counsel to complete and file a response to Defendant Brandee Chambers’ motion to dismiss.

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CONCLUSION

Plaintiff, by and through counsel, respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/ Paul S. Padda


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Attorney for Plaintiff

Dated: September 25, 2015

IT IS SO ORDERED:

Plaintiff's motion for extension of time to respond to Defendant Brandee Chambers' motion to dismiss is hereby granted. Plaintiff shall file a response on or before October 2, 2015.



UNITED STATES DISTRICT JUDGE
Dated: October 5, 2015

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on September 25, 2015, a copy of the foregoing document, "PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO THE MOTION TO DISMISS" was served (via the Court's CM/ECF system) upon all counsel of record.

/s/ Paul S. Padda

Paul S. Padda, Esq.